
Report To:	Audit Committee	Date:	25 February 2014
Report By:	Corporate Director ICHCP	Report No:	AC/76/14/AP/APr
Contact Officer:	Andi Priestman	Contact No:	01475 712251
Subject:	Information Governance and Management Review - Update		

1.0 PURPOSE

- 1.1 The purpose of this report is to update Audit Committee on the progress of the work of the Information Governance Steering Group (IGSG) in relation to addressing the actions arising from the review of Information Governance and Management which was carried out by Internal Audit in May 2009.

2.0 SUMMARY

- 2.1 In early 2009 Internal Audit carried out a high level review of information governance and management across all services of the Council. The review identified a range of issues and an action plan was developed to address those areas where the Council had the greatest gaps and a working group was subsequently established in December 2009 to develop the policies, procedures and processes that would be required in order to manage information more effectively.
- 2.2 A lot of progress was initially made by the working group in addressing a number of the issues but due to organisational changes during 2010, the working group has not fully met for some time. In addition, the introduction of the Records Management Scotland Act 2011 resulted in some of the actions not being able to be fulfilled until the Act came into force as these actions were directly affected by the new legislation.
- 2.3 The Corporate Director ICHCP was designated Corporate Lead for the working group in 2012 in order to regain momentum and the IGSG was formally re-established at its meeting on 17 September 2013 after the appointment of the Information Governance Officer in July 2013. Subsequent meetings have since been held and further meetings are scheduled for this year.
- 2.4 A progress report was presented to P&R Committee on 4 February 2014 together with an action plan which was approved. This action plan outlines the key actions to be completed in order to take forward the Information Governance and Management Framework approved in February 2012, which in turn will address the remaining actions arising from the Internal Audit review. A copy of this report is attached at **Appendix 1**.
- 2.5 Further reports will be submitted to P&R Committee on the progress of the IGSG Action Plan 2013/15 and specific progress on the Internal Audit review actions will be presented to Audit Committee as part of the normal follow up process.

3.0 RECOMMENDATIONS

- 3.1 It is recommended that Members note that an approved action plan in relation to Information Governance and Management is in place, which will address the remaining actions arising from Internal and External Audit reviews, and that further reports on action plan completion will be provided to Audit Committee as part of the normal follow up process.

Brian Moore
Corporate Director ICHCP

4.0 BACKGROUND

- 4.1 In early 2009 Internal Audit carried out a high level review of information governance and management across all services of the Council.
- 4.2 The review was initiated in response to the increased risk to the Council posed by ineffective information governance and management arrangements and a number of high profile cases where information had been poorly managed by other public organisations resulting in disruption to service delivery, reputational damage, regulatory censure and fines.
- 4.3 The review identified information governance and management as a significant area of risk and one of the biggest challenges facing the Council that if not managed properly could result in reputational damage, regulatory censure, fines and impact on service delivery.
- 4.4 An action plan was developed to address those areas where the Council had the greatest gaps and a working group was subsequently established in December 2009 to develop the policies, procedures and processes that would be required in order to manage information more effectively.
- 4.5 Although a significant amount of work has taken place to address the majority of actions arising from the review, due to the implementation of the Public Records Scotland Act 2011, some important issues were directly impacted by the legislation and as a consequence were incapable of being fulfilled until the extent of the new legislative requirements were known.

5.0 IMPLICATIONS

Finance

- 5.1 There are no direct financial implications arising from this report.

Legal

- 5.2 There are no direct legal implications arising from this report.

Human Resources

- 5.3 There are no direct HR implications arising from this report.

Equalities

- 5.4 There are no direct equalities implications arising from this report.

Repopulation

- 5.5 There are no direct repopulation implications arising from this report.

6.0 CONSULTATIONS

- 6.1 Lead officers from the IGSG were consulted in the preparation of this report.

7.0 LIST OF BACKGROUND PAPERS

- 7.1 Internal Audit Review of Information Governance and Management – May 2009
- 7.2 Information Governance and Management Framework - Report to P&R Committee 4/2/14

Report To: Policy and Resources Committee **Date:** 4 February 2014
Report By: Corporate Director
 ICHCP **Report No:** DR/CHCP/11/2014
Contact Officer: Dean Robinson **Contact No:** 01475 712136
Subject: INFORMATION GOVERNANCE AND MANAGEMENT
 FRAMEWORK

1.0 PURPOSE

1.1 The purpose of this report is to update Committee on progress of the work of the Information Governance Steering Group (IGSG) and the Information and Governance and Management Framework, in preparation for securing consistent good information governance practice and developing the Council's Records Management Plan (RMP).

2.0 SUMMARY

2.1 The Information Governance Steering Group (IGSG) was re-established at its meeting on 17 September 2013. Subsequent meetings have since been held and scheduled for the following year. Representation is made up from the Council and CHCP including Internal Audit, Legal Services, ICT, Communications, Procurement, Training and HR and Civil Contingencies Service.

2.2 A considerable amount of scoping work was undertaken by the Information Governance Officer (IGO) in collaboration with the Council's Internal Audit and Legal Services, which provided the basis for a development workshop which was held on 29 October 2013 with the following objectives:

- Move forward the Information Governance and Management Framework.
- Test our readiness to submit our Records Management Plan under the Public Records (Scotland) Act 2011 (PR(S)A)
- Develop and implement a programme of staff awareness and training.
- Agree key actions and deadlines to take forward.
- Create opportunities for information management working groups to drive forward activities on behalf of the Information Governance Steering Group.

2.3 The IGSG key actions are to develop the Inverclyde Council (and Licensing Board) Records Management Plan under the Public Records (Scotland) Act 2011, and regaining momentum on implementing the Information Governance and Management Framework, submitted to the Policy and Resources Committee in February 2012.

2.4 Organisational changes in culture and good practice will need to take place first before the framework action plans can be implemented.

2.5 To facilitate this, Information Management Working sub groups are being set up to focus on specific issues of high importance to the Council, bringing together representation from across the organisation. These groups will drive forward the agenda in their specific areas and coordinate activities on behalf of the IGSG.

3.0 RECOMMENDATIONS

- 3.1 It is recommended that Committee endorse this progress report and the continuation and activities of the Information Governance Steering Group. The programme of activities in this report will require the full backing and endorsement of Committee.
- 3.2 It is recommended that Committee agree that the IGSG Action Plan 2013/15 will take forward the Information Governance and Management Framework submitted in February 2012 and follow up the outstanding Audit Committee actions, as at 31 October 2013. A summary of the audit actions are as follows:
- Implementation of an information asset register in conjunction with the information classification scheme.
 - Information Governance and Management to form part of the corporate induction training programme for employees new to the Council, existing employees or when employees are trained in new systems.
 - Security awareness to be promoted using awareness raising materials such as brochures, posters, web based documents, training programmes and computer based training.
 - Information governance and management responsibilities specified in job descriptions, or in terms and conditions of employment including a confidentiality clause.
 - External third parties who need access to the Council's information and systems will be required to sign confidentiality agreements.
 - Processes to be developed and implemented to strengthen control over information governance and management. This should include:
 - Identifying owners for critical information and systems.
 - Investing in secure archiving facilities for records that must be retained in accordance with relevant legislation.

Further reports will be submitted on progress of the IGSG Action Plan 2013/15 and development of the Records Management Plan.

- 3.3 It is recommended that Committee endorse progress of the information management sub-groups carry forward the IGSG activities.
- 3.4 It is requested that Committee agree a further progress report is submitted in 6 months to the Policy & Resources Committee.

Brian Moore
Corporate Director
ICHCP

4.0 BACKGROUND

4.1 The Information Governance and Management Framework submitted to the Policy and Resources Committee in February 2012 endorsed a programme of activities which would need to take place to ensure that we have the appropriate controls in place to protect the information we hold and manage. This approach set out actions focused around People, Culture/Organisation and Process/Technology.

4.2 The IGSG identified the need for dedicated expertise to drive this work forward, and CMT authorised the recruitment of an Information Governance Officer (IGO). Since the IGO has come into post, this has allowed the capacity for robust scoping of the tasks that need to be undertaken, as well as considerable liaison with other local authorities that are either at similar or more advanced stages of the work programme.

4.3 This background work has been reviewed by the Information Governance Steering Group and has been used to evaluate our progress to date and identify milestones where some of these actions have taken place. However, further action is required to comply with the outstanding Audit Committee requirements, as well as supporting evidence for the Records Management Plan. A summary of the internal and external audit recommendations is:

- Implementation of an information asset register in conjunction with the information classification scheme.
- Information Governance and Management to form part of the corporate induction training programme for employees new to the Council, existing employees or when employees are trained in new systems.
- Security awareness to be promoted using awareness raising materials such as brochures, posters, web based documents, training programmes and computer based training.
- Information governance and management responsibilities specified in job descriptions, or in terms and conditions of employment including a confidentiality clause.
- External third parties who need access to the Council's information and systems will be required to sign confidentiality agreements.
- Processes to be developed and implemented to strengthen control over information governance and management. This should include:
 - Identifying owners for critical information and systems.
 - Investing in secure archiving facilities for records that must be retained in accordance with relevant legislation.

4.4 The IGSG Action Plan 2013/15 sets out the key actions required to help achieve reasonable assurance in information governance and also develop our Records Management Plan. Its key actions will be:

- To prepare and submit a Records Management Plan under the Public Records (Scotland) Act 2011 to the Keeper of Records Scotland (the Keeper) by June 2015.
- Collate evidence to support the RMP, and devise a systematic method for on-going evidence capture.
- Identify Information Asset Owners (IAOs) and train them appropriately.
- Develop a Corporate Information Asset Register.
- Undertake an initial audit of existing policies, standards, guidelines and tools.
- Review our information sharing arrangements in accordance with the Information Commissioner's Data Sharing Code of Practice and the Data Protection Act 1998 – this is also likely to entail the need to review our existing Information Sharing

Protocols (ISP) with a view to combining and updating to produce a single ISP across the Council and full Community Planning Partnership (Inverclyde Alliance).

- Delivery and monitoring take up of mandatory Information Governance training and awareness raising for staff across the Council and CHCP.
- Ensuring that EDRM work is harmonised with the requirements of our RMP.
- Develop and implement an Information Management Strategy.
- Develop a monitoring framework to oversee compliance with the RMP, Information Sharing Protocol, PSN Accreditation requirements and associated policies.

4.5 Information Governance Staff Survey

To help gauge awareness and current practices, an online Information Governance Survey was sent to all staff with access to a personal computer. The survey's aim would help us to assess what staff understood about information governance, whether the council was doing enough to protect information, importance of keeping information safe and improving the security of the information we handle. Results of the survey will be analysed by a sub-group and key areas will be targeted as part of the remit of the IGSG.

4.6 Public Records (Scotland) Act 2011 Inverclyde Council (and Licensing Board) Records Management Plan

The Public Records (Scotland) Act 2011 received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act requires each local authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for its records that it creates, whilst carrying out its business activities. The RMP must be agreed with the Keeper of Records and regularly reviewed.

Following negotiation on our state of readiness to submit our plan, the Keeper will schedule to speak to us in July 2014, to propose an invitation month of February 2015. Inverclyde Council (and Licensing Board) RMP submission would then be June 2015.

However, in addition to developing the plan and evidencing it, we must have mechanisms in place for it to be continually assessed and reviewed. There will need to be a change in practice and have structures in place to ensure that good practice is monitored and sustained.

The National Records of Scotland (NRS) and the Keeper encourage collaborative working across Authorities to share knowledge, experience and good practice. This has proved beneficial in learning the experiences of Authorities who have already completed and had their RMP approved. Inverclyde Council is making the most of collaborative working and has been doing this with its western authority neighbours; West Dunbartonshire Council and Renfrewshire Council.

The NRS have arranged a programme of surgeries, workshops and seminars on behalf of the Keeper. These programmes provide on-going engagement with the Keeper's office that helps authorities meet their obligations under the Act. Inverclyde Council has been represented at the following:-

- Public Records (Scotland) Act 2011 Implementation Surgery, September 2013 (Edinburgh)

- Workshop run by West Lothian Council on their experience building their RMP, November 2013 (Edinburgh)
- Getting Our Act Together: Implementation of the Public Records (Scotland) Act, 2011, December 2013 (Glasgow)

As part of this engagement, the NRS is also happy to send one of their representatives to visit Inverclyde Council. The IGSO will be following this up by inviting the Keeper's office to a future group meeting.

4.7 Scottish Council on Archives (SCA) Archives Records Management Services (ARMS) Toolkit

It is important that an authority's records management plan is properly assessed before and after the implementation of a RMP. The Keeper suggests that public authorities should consider implementing a self-assessment survey of their level of records management development, before creating a RMP for submission. Knowing our current state of compliance in the authority will help to determine where best to focus our energies and resources when developing the plan and determine where the most resource is needed.

The SCA have produced ARMS, a comprehensive assessment tool that has been endorsed by the Keeper. ARMS is an online self-evaluation tool that focuses on performance indicators to assess current records management provision. Inverclyde Council has registered with the SCA to use the ARMS toolkit. The Information Governance Officer will be facilitating a workshop for managers with responsibility for archives and records management services.

4.8 Information Management Working Groups

To facilitate its key actions and development of the RMP, Information Management Working sub-groups are being set up to focus on specific issues of high importance to the Council and coordinate activities on behalf of the IGSG. Together with the IGSG parent group they will all be known as the Information Governance Family:

Information Governance Steering Group (parent group)

Sub-groups

- Records Management (including EDRM)
- Information Sharing
- Training Awareness and Communication
- Data Quality
- Freedom of Information & Subject Access Requests Disclosures

Each group will have its own terms of reference however collaboration between the groups will be essential.

Membership for the Records Management, Information Sharing and Training Awareness and Communication groups have been confirmed. Initial meetings for the Records Management and Information Sharing groups were targeted as priority.

4.9 Records Management Working Group

This sub-group is being set up to support delivery of a Records Management Policy Framework, identify priorities for records management in the Council and CHCP and provide guidance on how to embed corporate policy into working practices of the directorates. The group will also help the Council to self-assess its current records management provision before implementation of the Records Management Plan. It is

envisaged that self-assessment will be undertaken at Corporate Directorate level and an overall summary from the Directorates will provide an overview of Inverclyde Council's state of readiness. Knowing our state of compliance will help determine where best to focus energies and resources when developing it.

To date, the group has identified shortfalls in good practice amongst staff in records keeping, archiving and destruction. The key driver to this will be to implement a culture of training and awareness in records management and a disciplined approach that can be monitored.

4.10 Information Sharing Working Group

This sub-group is being set up to support delivery of a corporate information sharing protocol and policy framework for the Council and wider community to ensure consistency in approaching information sharing. Information sharing remains an area of high importance and it is critical the Council reviews its information sharing arrangements both internally and externally. The group will also play a role in identifying our information assets, who has responsibility and the risks to them. We must have evidence that the authority undertakes information sharing and handling of personal information in a controlled and suitable manner. The implementation of a corporate Information Sharing Protocol and a local level data sharing code of practice is a priority.

4.11 Training, Awareness and Communication Working Group

This sub-group will support the delivery of a comprehensive mandatory information assurance training programme by developing a series of communication and awareness raising activities across the Council in Information Governance, Information Security, Records Management, Data Quality and Information Sharing. It will ensure staff records are updated to ensure their development as well as continuous assessment.

4.12 Data Quality Working Group

This sub-group will increase the profile of data quality handling and its importance to the Council. It will ensure that data produced by the Council is accurate, valid, reliable, timely, relevant and complete. They will work to ensure that a data quality strategy is effectively implemented across the Council and a mechanism for the regular monitoring of data.

4.13 Freedom of Information and Subject Access Requests Disclosures Working Group

This sub-group will oversee the implementation of a code of practice for requests made under the Freedom of Information (Scotland) Act and Subject Access Requests under the Data Protection Act. It will also provide a forum for all staff with a FOI(S)A and DP remit in the Council to come together and share knowledge and expertise including discussing the volume and types of requests and producing performance reports. The group will also review the current arrangements for processing requests with a view to better working and streamlined processes.

4.14 ICT Collaboration - Information as an Asset Workshop

The IGSG has representatives on this workshop. The purpose of the workshop was to bring together key stakeholders from Inverclyde, East Renfrewshire and Renfrewshire Councils to review the case for collaboration on the Information as an Asset Opportunity with the aim of enabling the right people to have the right information in a timely manner and with the right permissions to deliver the right services that customers need. Further workshops will be arranged in due course.

4.15 Electronic Document Records Management System (EDRMS)

The Revenues & Benefits Service has undertaken EDRMS successfully, serving as a model for the rest of the Council. The CHCP is now working through its EDRMS preparation, which will be governed by the requirements of the RMP and associated policies, and the Directorate's commitment to electronic records rather than paper ones. This will improve information security, particularly in respect of sensitive client information, and will support the CHCP's accommodation moves scheduled for 2014, reducing the requirement for paper filing space. The Information Governance Officer is a member of the CHCP's EDRMS working group, supporting consistency with Information Governance requirements.

4.16 PSN Accreditation

A key requirement of the PSN Accreditation process is a comprehensive understanding of the information held and processed by the Council. The work of the IGSG and sub-groups will play a key role in defining this and supporting the accreditation process.

5.0 IMPLICATIONS

- 5.1 Financial Implications: The framework policy in itself will have no direct financial implications. However it must be noted that further work aligned to the development of the strategy may require investment. It is recommended that any cost is looked at as an on-going business expense worth investing in.

One off Costs

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (if applicable)	Other Comments
N/A					

- 5.2 HR: Framework will place responsibilities on staff following review of the Code of Conduct in compliance with information governance, data protection and IT security responsibilities.
- 5.3 Legal: The recommendations made in this progress report will be consistent with the Council's processes in line with legislative requirements, including the Data Protection Act 1998

- The DPA is regulated and enforced by the Information Commissioner's Office ("the ICO")
- All organisations processing personal data are required to comply with DPA
- This is the current legislation and is based upon an EU Directive
- Currently a new Directive is being debated and this is likely to be agreed by the end

of 2013

- The new Directive will place much more onerous obligations on all organisations responsible for processing personal data and gives regulators such as the ICO much greater enforcement powers
- Data protection is getting more and more important for businesses – and the general public are becoming more aware of their rights.

PSN Accreditation Requirements – The Framework and Action Plan will enable the Council meet these requirements.

5.4 Equalities: The issue of equalities will be important within the framework in respect of how we best ensure that the management, handling and storing of information can be secured in such a manner as to meet our duty for access and sharing of information. Key policies developed will have an equality impact assessment carried out where applicable.

5.5 Repopulation: None